

Exhibit C

Elmer, Lauren A.

From: Dalsen, William D. <wdalsen@proskauer.com>
Sent: Tuesday, September 10, 2024 4:04 PM
To: Dunne, Christopher J.; Wang, Lisa V.; Rosen, Brian S.
Cc: Glueckstein, Brian D.; Croke, Jacob M.; Marker, Dylan J.; Sazant, Jordan; Sanchez
Tavarez, Genesis G.; Lavin, Phoebe A.; Sedlak, Jonathan M.
Subject: [EXTERNAL] RE: FTX Trading v. LayerZero Labs - Discovery

Chris –

Thanks for sending back that proposal. We're OK with it, and you can sign for us and file. Thanks for fielding filing.

--Will

William D. Dalsen
Senior Counsel

[Proskauer \[proskauer.com\]](http://Proskauer.proskauer.com)

One International Place
Boston, MA 02110-2600

d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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From: Dunne, Christopher J. <Dunnec@sullcrom.com>
Sent: Tuesday, September 10, 2024 12:04 PM
To: Dalsen, William D. <wdalsen@proskauer.com>; Wang, Lisa V. <wanglisa@sullcrom.com>; Rosen, Brian S. <brosen@proskauer.com>
Cc: Glueckstein, Brian D. <gluecksteinb@sullcrom.com>; Croke, Jacob M. <crokej@sullcrom.com>; Marker, Dylan J. <DMarker@proskauer.com>; Sazant, Jordan <JSazant@proskauer.com>; Sanchez Tavarez, Genesis G. <GSanchezTavarez@proskauer.com>; Lavin, Phoebe A. <lavinp@sullcrom.com>; Sedlak, Jonathan M. <sedlakj@sullcrom.com>
Subject: RE: FTX Trading v. LayerZero Labs - Discovery

This email sent by dunnec@sullcrom.com originated from outside the Firm.

Will:

Thank you for your counterproposal for the modified schedule. In the attached, we have retained Defendants' proposed July 25, 2025 deadline for completion of summary judgment briefing but have adjusted some of the interim discovery dates. For ease of reading, we have removed the track changes and highlighted Defendants' proposed dates in green. Plaintiffs' new proposed dates are highlighted in yellow.

If this works for Defendants, we will get it on file.

Thanks.

Christopher J. Dunne
+1 212 558 4115 (T) | +1 646 808 4467 (M)

From: Dalsen, William D. <wdalsen@proskauer.com>

Sent: Monday, September 9, 2024 5:21 PM

To: Dunne, Christopher J. <Dunnec@sullcrom.com>; Wang, Lisa V. <wanglisa@sullcrom.com>; Rosen, Brian S. <brosen@proskauer.com>

Cc: Glueckstein, Brian D. <gluecksteinb@sullcrom.com>; Croke, Jacob M. <crokej@sullcrom.com>; Marker, Dylan J. <DMarker@proskauer.com>; Sazant, Jordan <JSazant@proskauer.com>; Sanchez Tavarez, Genesis G. <GSanchezTavarez@proskauer.com>; Lavin, Phoebe A. <lavinp@sullcrom.com>; Sedlak, Jonathan M. <sedlakj@sullcrom.com>

Subject: [EXTERNAL] RE: FTX Trading v. LayerZero Labs - Discovery

Hi Chris –

Thanks for your email.

We disagree with your characterizations of our conference. While it would not be productive to engage with every detail, we do want to make a few things clear in an effort to move things forward:

- On the schedule, we said only that we would consider what FTX proposed—but a week later, we had not received a proposal, and lost a week of the short schedule that remained.
- On depositions, and as we noted on the call, we’re entitled both to speak to persons with knowledge *and* to confirm for ourselves that others do not have knowledge to avoid surprise at trial. We do not view our position on witnesses as an “about-face.”
- On Mr. Pellegrino, my statement was intended to state the obvious—namely, that as we discussed, there may be significant barriers to deposing a witness in a U.S. litigation in Canada, which may indeed make it such that he is unavailable for deposition in Canada. We are not asserting that he cannot be deposed.

Putting that aside, we have considered your proposal to extend the schedule in the adversary proceeding (and thank you for sending it), and we agree that an extension makes sense. We have attached our counterproposal in redline to this email, which shortens your proposal as it relates to discovery but keeps the current summary-judgment deadlines. At this juncture, we believe our proposal will provide the parties sufficient time to complete discovery and proceed to summary-judgment briefing.

Please let us know your thoughts on this counterproposal, and whether it would be helpful to discuss. Once we come to ground on the schedule, we can reset on the discovery that remains and on the timing of depositions to be conducted in this adversary proceeding.

Thanks,

--Will

William D. Dalsen

Senior Counsel

[Proskauer \[proskauer.com\]](mailto:wdalsen@proskauer.com)

One International Place
Boston, MA 02110-2600

d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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From: Dunne, Christopher J. <Dunnec@sullcrom.com>

Sent: Thursday, September 5, 2024 8:15 PM

To: Dalsen, William D. <wdalsen@proskauer.com>; Wang, Lisa V. <wanglisa@sullcrom.com>; Rosen, Brian S. <brosen@proskauer.com>

Cc: Glueckstein, Brian D. <gluecksteinb@sullcrom.com>; Croke, Jacob M. <crokej@sullcrom.com>; Marker, Dylan J. <DMarker@proskauer.com>; Sazant, Jordan <JSazant@proskauer.com>; Sanchez Tavarez, Genesis G. <GSanchezTavarez@proskauer.com>; Lavin, Phoebe A. <lavinp@sullcrom.com>; Sedlak, Jonathan M. <sedlakj@sullcrom.com>

Subject: RE: FTX Trading v. LayerZero Labs - Discovery

This email sent by dunnec@sullcrom.com originated from outside the Firm.

Will:

I was surprised, to say the least, by your below e-mail, because it is inconsistent in many respects with what you told us during our meet-and-confer call on August 23 concerning a variety of discovery issues.

For example, we discussed the need to adjust some of the deadlines in the Case Management Order because of the absence of discovery activities during the parties' mediation and subsequent settlement discussions, and the numerous outstanding discovery issues, such as the additional categories of documents that LayerZero still had not produced and the 30(b)(6) deposition that we had noticed months earlier and, at LayerZero's request, delayed during the pendency of our discussions. During our call, you recognized the need to modify the schedule and asked us to send you a proposed new schedule. Now, however, you say that you are "not in a position" to agree to extend the schedule. Nevertheless, we are attaching a proposed new schedule and hope that you will consider and agree to it.

With respect to your request for a deposition of Mr. Ray and 30(b)(6) depositions of each of the plaintiffs, you said during our call that you wanted to depose persons "with knowledge" of the transactions at issue in our adversary proceeding. We explained that Mr. Ray did not become involved with the Debtors until after the petition dates and after the transactions at issue, and thus would not have such knowledge. We also explained that any 30(b)(6) witnesses would have similar limitations given that plaintiffs no longer have any employees who were involved in the transactions at issue. You had no response to these observations. We therefore suggested that, before pressing for depositions of witnesses that would be inefficient and unnecessary such as Mr. Ray and 30(b)(6) witnesses, you complete your review and analysis of the Debtors' extensive document production, and take depositions of percipient witnesses with personal knowledge of relevant matters, such as Caroline Ellison, whose deposition you have already noticed. During our call you indicated that this seemed like a sensible and more efficient approach. Your email below is an about-face from your

position during our call and urges an approach that is inefficient and will result in unnecessary expenditures of time and resources. We ask you to reconsider and accept the approach we proposed during the call.

With respect to Mr. Litan, we stated during our call that we would agree to take his deposition in Washington, D.C., as you requested. You agreed to propose dates for his deposition, so please do so. With respect to Mr. Pellegrino, we agreed to discuss a mutually agreeable location for his deposition given that he resides in Canada, but now you are saying that Mr. Pellegrino “may not be available for deposition there [in Canada].” As you know, Mr. Pellegrino has asserted a claim in the Chapter 11 cases and therefore has submitted to jurisdiction in the Bankruptcy Court. Moreover, given his senior position at LayerZero and active involvement in the transactions at issue, he obviously is a key witness; You cannot seriously contend that he can avoid being deposed in this matter by trying to hide in Canada. This testimony is particularly necessary given that LayerZero has preserved very few documents from the relevant period. Please propose dates and locations in the United States for his deposition. Please also propose dates and locations for the Rule 30(b)(6) deposition of LayerZero that we noticed on April 9, 2024, and which we have requested proposed dates for numerous times and Defendants have repeatedly refused to provide.

You also agreed during our call to consider and provide your positions on various other discovery issues. This includes Plaintiffs’ requests for documents and communications related to transactions involving and valuations of LayerZero’s equity, the STG and ZRO tokens and related warrants, including any information related to the pre-petition transactions identified in LZDefendants_00034353. Defendants have repeatedly asserted that this valuation information is directly relevant to the claims and defenses in this action, making it difficult for us to understand your repeated refusal to produce the requested information. Further, Plaintiffs agreed during our call to consider and providing information on whether Shah Hafizi has responsive documents, and your position on adding Shah Hafizi as a document custodian. Your email did not address any of these issues. Please provide the responses that you agreed to provide.

Please let us know if you are available to discuss these issues on Monday, September 9.

Best,
Chris

Christopher J. Dunne
[+1 212 558 4115](tel:+12125584115) (T) | [+1 646 808 4467](tel:+16468084467) (M)

From: Dalsen, William D. <wdalsen@proskauer.com>

Sent: Friday, August 30, 2024 11:37 AM

To: Dunne, Christopher J. <Dunnec@sullcrom.com>; Wang, Lisa V. <wanglisa@sullcrom.com>; Rosen, Brian S. <brosen@proskauer.com>

Cc: Glueckstein, Brian D. <gluecksteinb@sullcrom.com>; Croke, Jacob M. <crokej@sullcrom.com>; Marker, Dylan J. <DMarker@proskauer.com>; Sazant, Jordan <JSazant@proskauer.com>; Sanchez Tavarez, Genesis G. <GSanchezTavarez@proskauer.com>; Lavin, Phoebe A. <lavinp@sullcrom.com>

Subject: [EXTERNAL] RE: FTX Trading v. LayerZero Labs - Discovery

Chris –

Following up on our call, we haven’t received a proposal to extend the case schedule from you folks as of yet. We nevertheless discussed on our end, and we’re not in a position to extend the discovery schedule or postpone depositions. We therefore expect the depositions of FTX, West Realm, and Alameda to go forward on 9/26 and 9/27 as noticed back in June. If Mr. Ray will be a designee of one or more of those entities, we’re amenable to conducting his personal deposition on one of those same days rather than on 9/24 as previously noticed. We intend to subpoena Ms. Ellisen next week for a deposition in the discovery period. As for LayerZero,

Mr. Litan, and Mr. Pellegrino, we will revert with dates, with the caveat Mr. Litan must be deposed in DC, and with the reservation that Mr. Pellegrino resides in Canada (and may be unavailable for deposition there), as discussed previously.

Thanks,

--Will

William D. Dalsen

Senior Counsel

[Proskauer \[proskauer.com\]](mailto:Proskauer@proskauer.com)

One International Place
Boston, MA 02110-2600

d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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From: Dunne, Christopher J. <Dunnec@sullcrom.com>

Sent: Thursday, August 22, 2024 10:24 AM

To: Dalsen, William D. <wdalsen@proskauer.com>; Wang, Lisa V. <wanglisa@sullcrom.com>; Rosen, Brian S. <brosen@proskauer.com>

Cc: Glueckstein, Brian D. <gluecksteinb@sullcrom.com>; Croke, Jacob M. <crokej@sullcrom.com>; Marker, Dylan J. <DMarker@proskauer.com>; Sazant, Jordan <JSazant@proskauer.com>; Sanchez Tavarez, Genesis G. <GSanchezTavarez@proskauer.com>; Lavin, Phoebe A. <lavinp@sullcrom.com>

Subject: RE: FTX Trading v. LayerZero Labs - Discovery

This email sent by dunnec@sullcrom.com originated from outside the Firm.

We are available from 1:30-2 tomorrow. We will send a zoom link.

Thanks.

Christopher J. Dunne

+1 212 558 4115 (T) | +1 646 808 4467 (M)

From: Dalsen, William D. <wdalsen@proskauer.com>

Sent: Wednesday, August 21, 2024 2:33 PM

To: Wang, Lisa V. <wanglisa@sullcrom.com>; Rosen, Brian S. <brosen@proskauer.com>

Cc: Glueckstein, Brian D. <gluecksteinb@sullcrom.com>; Dunne, Christopher J. <Dunnec@sullcrom.com>; Croke, Jacob M. <crokej@sullcrom.com>; Marker, Dylan J. <DMarker@proskauer.com>; Sazant, Jordan <JSazant@proskauer.com>; Sanchez Tavarez, Genesis G. <GSanchezTavarez@proskauer.com>

Subject: [EXTERNAL] RE: FTX Trading v. LayerZero Labs - Discovery

Counsel –

Please see the attached correspondence.

Thank you.

William D. Dalsen
Senior Counsel

[Proskauer \[proskauer.com\]](mailto:wdalsen@proskauer.com)

One International Place
Boston, MA 02110-2600

d 617.526.9429

f 617.526.9899

wdalsen@proskauer.com

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Please consider the environment before printing this email.

From: Wang, Lisa V. <wanglisa@sullcrom.com>

Sent: Friday, August 9, 2024 6:40 PM

To: Rosen, Brian S. <brosen@proskauer.com>

Cc: Glueckstein, Brian D. <gluecksteinb@sullcrom.com>; Dunne, Christopher J. <Dunnec@sullcrom.com>; Croke, Jacob M. <crokej@sullcrom.com>; Dalsen, William D. <wdalsen@proskauer.com>; Marker, Dylan J. <DMarker@proskauer.com>; Sazant, Jordan <JSazant@proskauer.com>

Subject: FTX Trading v. LayerZero Labs - Discovery

This email sent by wanglisa@sullcrom.com originated from outside the Firm.

Brian,

Please see the attached correspondence.

Best

Lisa

Lisa V. Wang

SULLIVAN & CROMWELL LLP

125 Broad Street | New York, NY 10004-2498

+1 212 558 3141 (T)

wanglisa@sullcrom.com | www.sullcrom.com

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